IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MICHIGAN

COLLEEN VANOCKER, individually and on behalf of all others similarly situated,

Plaintiff,

v.

FOUNDATION FOR NATIONAL PROGRESS,

Defendant.

Case No. 1:21-cv-00669- HYJ-RSK

HON. HALA Y. JARBOU

CLASS ACTION

STATUS UPDATE, STIPULATION AND ORDER TO CONTINUE STAY FOR 14 DAYS

Plaintiff Colleen Vanocker ("Plaintiff") and Defendant Foundation for National Progress d/b/a Mother Jones ("Defendant" or "Mother Jones") hereby stipulate to, and request that the Court order, a further 14 day stay of this action to allow the parties to finalize a dismissal.

WHEREAS, on March 11, 2022, the Court stayed this action until May 9, 2022 to permit the parties to conduct private mediation. (ECF No. 26.)

WHEREAS, on May 10,2022 the Court granted a further 14 day stay to allow the parties to finalize a settlement agreement. (ECF No. 29.)

WHEREAS, Mother Jones' reply in support of its motion to dismiss is currently due May 24, 2022.

WHEREAS, the Parties have executed a settlement and seek a further 14 stay of this action so that the Parties may finalize a dismissal.

NOW THEREFORE, the parties stipulate to and request that the Court stay this action, including the pending deadline for Mother Jones to file a reply, for 14 days.

IT IS ORDERED that this action, including the pending deadline for Mother Jones

to file a reply, is stayed for 14 days. NO FURTHER EXTENSIONS.

IT IS SO ORDERED.

Date: May 23 , 2022 /s/ HALA Y. JARBOU
Hon. Hala Y. Jarbou
United States District Judge

Stipulations:

Dated: May 23, 2022

/s/ Philip L. Fraietta (w/ permission)

Philip L. Fraietta (P85228) pfraietta@bursor.com Joseph I. Marchese jmarchese@bursor.com BURSOR & FISHER, P.A. 888 Seventh Avenue New York, New York 10019

Tel: 646.837.7150 Fax: 212.989.9163

Frank S. Hedin fhedin@hedinhall.com Arun G. Ravindran aravindran@hedinhall.com HEDIN HALL LLP 1395 Brickell Avenue, Suite 1140 Miami, Florida 33131

Tel: 305.357.2107 Fax: 305.200.8801

Counsel for Plaintiff and the Putative Class

/s/ Tenaya Rodewald

Tenaya Rodewald trodewald@sheppardmullin.com Kevin M. Cloutier (P81503) kcloutier@sheppardmullin.com SHEPPARD, MULLIN, RICHTER & HAMPTON LLP 70 West Madison Street, 48th Floor Chicago, Illinois 60602 Phone 312.499.6300 Fax 312.499.6301

Attorneys for Defendant